

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

COMMISSIONER OF THE DEPARTMENT  
OF LICENSING AND CONSUMER  
AFFAIRS, ET AL.,

PLAINTIFFS,

V.

PEPSICO, INC., ET AL.

DEFENDANTS.

CASE NO. 1:25-CV-00024

**MOTION FOR *PRO HAC VICE* ADMISSION OF ANDREW S. TULUMELLO, ESQ.**

In accordance with Rule 83.1(b)(2) of the Local Rules of Civil Procedure, PepsiCo, Inc. and Pepsico Caribbean, Inc. move for the admission *pro hac vice* of Andrew S. Tulumello, Esq. of the law firm Weil, Gotshall & Manges LLP, located at 2001 M Street NW, Suite 600, Washington, D.C. 20036; Telephone number (202) 682-7000, for purposes of appearing as co-counsel on their behalf in the above-styled case.

In support thereof Movants state as follows:

1. Attorney Tulumello is a member in good standing of the State Bar of California and the District of Columbia Bar.
2. Attorney Tulumello is not admitted to practice in the District Court of the Virgin Islands.
3. Attorney Tulumello has not been disbarred, denied admission to practice, suspended from practice, or disciplined by any court or bar authority, and there are no disciplinary proceedings pending against her, as affirmed by Attorney Tulumello in his signed *Pro Hac Vice* Application, attached hereto as Exhibit

A.

4. Undersigned counsel has made an appearance in this action, is a member in good standing of Virgin Islands Bar and the District Court of the Virgin Islands, and is authorized to file through the Court's electronic filing system.
5. Undersigned counsel consents to be designated as the member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom all notices, orders and pleadings may be served, and who shall approve and sign all documents filed and served on behalf of Movants in this action.
6. In accordance with the local rules of this Court, the undersigned has made payment of this Court's \$250.00 admission fee.

WHEREFORE, PepsiCo, Inc. and Pepsico Caribbean, Inc., respectfully request that this Court enter an Order granting Andrew S. Tulumello admission *pro hac vice* to appear before this Court on their behalf for all purposes relating to the proceedings in the above-styled matter.

Respectfully submitted,

**ANDREW C. SIMPSON, P.C.,**  
Counsel for PepsiCo, Inc. and PepsiCo  
Caribbean, Inc.

Dated: May 20, 2025

/s/ Andrew C. Simpson  
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